

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

|                                   |   |   |
|-----------------------------------|---|---|
| IN RE:                            | ) | Chapter 11                                    |
|                                   | ) |   |
| W.R. GRACE & CO., <u>et al.</u> , | ) | Case No. 01-1139 (JKF)                        |
|                                   | ) |   |
| Debtors.                          | ) | Jointly Administered                          |
|                                   | ) | <b>Objections due by: 1/10/06 @ 4:00 p.m.</b> |
|                                   | ) | <b>Hearing Date: 1/30/06 @ 12:00 p.m.</b>     |

**NOTICE OF MOTION**

TO: All Parties on the 2002 Service List

BNSF Railway Company and its predecessor corporations, including the Great Northern Railway Company, the Burlington Northern Railroad Company, and The Burlington Northern & Santa Fe Railway Company (collectively, "BNSF") has filed the attached Motion of BNSF for Clarification of the Case Management Order for the Estimation of Asbestos Personal Injury Liabilities and Accompanying Questionnaire (the "Motion") which seeks the following relief: Clarification and/or modification of the Case Management Order previously entered by the Court in these cases.

Objections or responses, if any, to the attached Motion must be filed on or before January 10, 2006 at 4:00 p.m. with the United States Bankruptcy Court for the District of Delaware and at the same time served upon the undersigned counsel and the parties listed on the attached service list.

A HEARING ON THE MOTION WILL BE HELD ON January 30, 2006 at 12:00 p.m.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: December 22, 2005  
Wilmington, Delaware

PEPPER HAMILTON LLP

/s/ Adam Hiller

Adam Hiller (DE No. 4105)  
Hercules Plaza, Suite 5100  
1313 North Market Street  
Wilmington, Delaware 19801  
Telephone: (302) 777-6500  
Facsimile: (302) 421-8390

and

Edward C. Toole, Jr.  
Anne Marie Aaronson  
PEPPER HAMILTON LLP  
3000 Two Logan Square  
18th & Arch Streets  
Philadelphia, PA 19103  
Tel: (215) 981-4000  
Fax: (215) 981-4750

*Attorneys for BNSF Railway Company*